

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 3, 10, 11.1

ASIA23/CRD12  
Original language only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### FAO/WHO COORDINATING COMMITTEE FOR ASIA

#### Twenty-third Session

#### COMMENTS OF INDIA

#### Agenda Item 3: Matters arising from the Codex Alimentarius Commission and Codex subsidiary bodies

1. In response to the recommendation to review the Regional code of hygienic practice for street-vended foods in Asia (CXC 76R-2017), in line with the request of CCFH54, India has prepared a discussion paper on review of Regional code of hygienic practice for street-vended foods in Asia (CXC 76R-2017). The Discussion paper is available as CRD06 on CCASIA23 webpage for the consideration of CCASIA members.
2. India agrees with the deletion of riboflavin, synthetic (INS 101(i)) from the table to Section 4 of CXS 298R-2009. Further, we agree that other individual additives in the group of RIBOFLAVINS are acceptable for use in foods conforming to CXS 298R-2009.

**Rationale:** As per Indian Regulations, food additives for fermented soybean paste include group of RIBOFLAVINS at level of 30 mg/Kg that has inclusion of Riboflavin, synthetic 101(i), Riboflavin 5'-phosphate sodium 101(ii), Riboflavin (Bacillus subtilis) 101(iii). However, Riboflavin from *Ashbya gossypii* 101(iv) is not included in Indian Regulations.

Riboflavin is vitamin B2 can be from synthetic or natural source. There is no method to identify the origin. Riboflavin is the metabolite form of Riboflavin 5 phosphate. The Riboflavin 5 phosphate ester sodium salt as an additive is not a skin/eye irritant and it is not considered a respiratory sensitiser.

#### Agenda Item 10: Draft regional standard for quick frozen dumpling (Asia)

India proposes to expand the basic ingredients list to explicitly include maize flour and various millet flours (e.g., finger millet [ragi], pearl millet [bajra], foxtail millet, sorghum [jowar], little millet, kodo millet, barnyard millet) as permissible dough bases in Section 3.1.1 of Draft regional standards for quick frozen dumpling.

**Rationale:** This will encourage diversification and use of climate-resilient cereals, promote cereal diversity in dumpling skin formulations and provide gluten-free options for certain consumer segments.

#### Agenda Item 11.1: Proposal for the development of a regional standard for traditional sweets (Asia)

India will be withdrawing its proposal for new work on traditional sweets.

This decision has been reached after several deliberations, keeping in view the technical challenges associated with defining uniform safety and quality parameters; given the wide variety of ingredients and preparation methods involved in traditional sweets. In addition, the absence of national or international baseline standards under the current regulatory framework presents a significant hurdle for advancing this proposal. Furthermore, the rich diversity of food cultures across Asia makes it particularly complex to establish a common standard at this stage.

India will consider submitting a new proposal later should the need arise.